

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

EX PARTE APPLICATION OF
IRAQ TELECOM LIMITED FOR AN
ORDER TO OBTAIN DISCOVERY FOR
USE IN FOREIGN PROCEEDINGS
PURSUANT TO 28 U.S.C. § 1782

MISCELLANEOUS ACTION

Case No. 19-175

ORAL ARGUMENT REQUESTED

**IRAQ TELECOM LIMITED'S MOTION FOR AN AWARD OF FEES AND COSTS
AND FOR RECONSIDERATION OF THE COURT'S NOVEMBER 12, 2021 ORDER**

Pursuant to Federal Rule of Civil Procedure 37(a)(5), Applicant Iraq Telecom Limited (“**Iraq Telecom**”), by and through undersigned counsel, respectfully moves for an award of fees and costs related to its motion to compel (ECF 20).

In addition, pursuant to Local Rule 7.1(g), Iraq Telecom, by and through undersigned counsel, respectfully moves for reconsideration of the Order dated November 12, 2021 (ECF 56).

In support of this motion, in addition to the accompanying Memorandum of Law, Iraq Telecom submits the appended sworn declaration of Kristin N. Tahler with accompanying exhibits.

* * *

Dated: November 26, 2021

By: /s/ Kristin N. Tahler

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